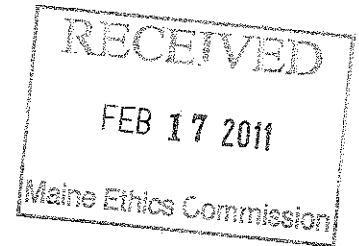


February 17, 2011

Daniel W. Walker

February 17, 2011



Jonathan Wayne, Executive Director
Commission on Governmental Ethics
135 State House Station
Augusta, ME 04333-0135

Re: Ethics Commission

Dear Jonathan,

The following are the answers by Rich Connor to the questions posed in your February 14 letter verbatim:

Question #1: If the political action committee (PAC) which opposed the November 2, 2010 Portland referendum had requested advertising space to express its opposition to the referendum, would the Portland Press Herald have provided free advertising space to the PAC?

- A. Rich Connor Response: Probably not, but not for the reasons you might suspect. The issue is not whether someone agrees or disagrees with our editorial position, as evidenced by the fact that we published many letters in opposition to the elected mayor and even invited Cheryl Leeman to do a guest editorial. Rather, it is because we provide free advertising to not-for-profit *civic organizations* such as the Chamber, the Red Cross, Spurwink, etc. PACs are not the sort of organization we are interested in providing free advertising to.

Question #2. If the Portland Regional Chamber of Commerce and the Portland Press Herald were supporting the same candidate for Governor in the 2010 general election and the Chamber had asked for six full pages of advertising space to promote the candidate, would the Portland Press Herald have provided the advertising space to the Regional Chamber for that purpose?

- A. Rich Connor Response: Again, the issue is not whether the Chamber agrees or disagrees with our editorial position. The issue is whether we have a commitment to a not-for-profit civic organization to provide free advertising. If so, we will honor that commitment without editorial control over layout and content. So the response to your entirely hypothetical question is probably "yes." And it is equally likely, under this hypothetical, that the Chamber or any involved PAC would have

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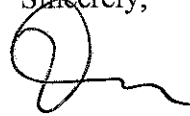
Jonathan Wayne, Executive Director

February 17, 2011

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reported the contribution of that space exactly as happened with the
elected mayor issue.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Walker', with a stylized flourish at the end.

Daniel W. Walker

DWW:lpw